

RICHARD A. VAN WAGONER (4690)
NATHAN A. CRANE (10165)
SPENCER FANE LLP
10 Exchange Place, Eleventh Floor
Post Office Box 45000
Salt Lake City, Utah 84145-5000
Telephone: (801) 521-9000
rvanwagoner@spencerfane.com
ncrane@spencerfane.com
Attorneys for Aaron Wagner

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON A. WAGNER, and
MICHAEL MAINS,

Defendant.

**STIPULATED MOTION TO MODIFY NO
CONTACT ORDER**

Case No. 2:24-cr-00357

Judge Ted Stewart

Defendant Aaron Wagner, with the stipulation of Michael Mains and the United States, hereby files with Motion To Modify the No Contact Order.

1. On November 8, 2024 Mr. Wagner appeared for his arraignment on the Indictment and had his detention hearing. Dkt. 32.
2. At the conclusion of the detention hearing Mr. Wagner was released from custody. One of Mr. Wagner's special conditions of release was to have no direct or indirect contact with co-defendant Michael Mains. Dkt. 33.

3. Mr. Wagner and Mr. Mains are business partners in several entities. In order to conduct the business affairs of these entities, it is necessary for Mr. Wagner and Mr. Mains to be able to communicate to make business decisions. Prohibiting Mr. Wagner and Mr. Mains from having contact will significantly impact multiple businesses, employees, and investors in those businesses.
4. Mr. Wagner proposes the no contact order be modified to allow Mr. Wagner to be able to communicate with Mr. Mains as long as counsel for each individual is present for the communication. Mr. Wagner and Mr. Mains would not be allowed to communicate with one another outside the presence of their counsel.
5. The proposed modification has been discussed with Matt Lewis, counsel for Mr. Mains, and Carl LeSueur, counsel for the United States. Both attorneys have indicated they stipulate to the proposed modification of the no contact order.
6. Therefore, based on the foregoing, the parties request Mr. Wagner's no contact order to be modified to allow him to communicate with Mr. Mains provided that Mr. Wagner's and Mr. Mains' counsel are present.

DATED this 22nd day of November 2024.

SPENCER FANE LLP

/s/ Nathan A. Crane

Nathan A. Crane

Richard A. Van Wagoner

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **STIPULATED MOTION TO MODIFY NO CONTACT ORDER** was served upon Plaintiff by submission of the document for electronic filing on November 22, 2024.

Carl D. LeSueur
Brent L. Andrus
Assistant United States Attorney
111 S. Main Street, Ste. 1800
Salt Lake City, UT 84111
801-524-5682
Carl.lesueur@usdoj.gov
Brent.Andrus@usdoj.gov
Attorney for Plaintiff

/s/ Megan Neff

Legal Assistant